

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 22-cv-22897-Williams

Ryan Bowers,

Plaintiff,

v.

Trading Card World LLC, at al.

Defendants.

**DECLARATION OF RYAN BOWERS IN SUPPORT OF
MOTION FOR FINAL DEFAULT JUDGMENT**

1. My name is Ryan Bowers and I am the Plaintiff in the above-styled action.
2. I was hired by Defendants, Trading Card World LLC and Adrianna Ucros, to work at their kiosk in International Mall. I worked there from June 29 to around August 1, 2022.
3. Adrianna Ucros was/is an owner and manager of Trading Card World. She was the one who hired me and paid me. She was my main point of contact within the company.
4. As the only person usually working I regularly handled all of the monetary transactions including through credit cards and payment applications like PayPal and CashApp. It is my belief that many of the International Mall customers were from outside the state of Florida due to the phone numbers they would have to use to process payments.
5. For the 5 weeks that I worked for Trading Card World, I regularly worked between 20 and 40 hours per week. I was promised to be paid \$10 per hour (minimum wage), but was only regularly paid approximately \$125 per week.
6. I made several complaints about not being paid minimum wage. Adrianna Ucros told me

that business was slow and that she would eventually pay me the rest of what I was owed.

She regularly made this promise, but never did anything to pay me my owed wages.


7. Eventually I told her that I could not come in to work until she paid me what I was owed.

She again told me that she would pay me, but then did not put me on the schedule anymore.

At this point, she cut off all communication with me and obviously never paid me the balance. She took me off the schedule as retaliation for my wage complaints.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DECLARATION AND THAT THE FACTS STATED IN IT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date: November 22, 2022.


Ryan Bowers (Nov 22, 2022 17:12 EST)
Ryan Bowers







0403 - Declaration of Ryan Bowers

Final Audit Report

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